REMARKS

The Examiner is thanked for the careful examination of the application.

Art Rejections:

Claims 8-10 and 12-15 have been rejected under 35 U.S.C. 103(a) as allegedly being anticipated by U.S. Patent No. 5,647,010, hereinafter *Okubo,* in view of U.S. Patent No. 6,430,711, hereinafter *Sekizawa.*

One of the objects of the present invention is to provide an inhibition control for an image processing system by comparing an inhibition control pattern to an image to be output. In one embodiment, the inhibition control conditions or pattern is converted so as to conform to output characteristics of the image output device to be used. By conforming the inhibition control conditions or pattern to the image output device, the system can be used with different output devices. Specifically, according to preferred embodiments of the invention, the inhibition conditions are capable of being modified to ensure conformance with the image data that has been converted for a particular output device.

With regard to claim 8, an image processor combination includes a memory device which stores output inhibition conditions for inhibiting print of an image including a specified pattern and a converter which converts the output inhibition conditions to detection parameters according to output characteristics of the image output device. The combination further includes a detector which detects the specified pattern in the input image data based on the detection parameters converted by the converter. Thus, the claimed converter converts the output inhibition conditions before the detector determines whether the input image data should be inhibited.

The Examiner alleges that *Okubo* and *Sekizawa* teach and suggest the subject matter of claim 8.

On page 4 of the Official Action, it is stated that the predetermined thresholds used in *Okubo* are based on the inhibition patterns, and that the "threshold values used in detection *must be derived* from converting the inhibit pattern information into detection parameters for the parameters to be used in pattern detecting." However, there is no support for those conclusions. There is no discussion of selecting the thresholds used in the first embodiment of *Okubo*. And, in the second embodiment, the thresholds are set based on the desired detection and decision accuracies, not based on the inhibit pattern. See column 11, lines 9 – 22.

On page 4 of the Official Action, it is alleged that the ROM (presumably 901) stores detection parameters for the pattern detection, "thus implying that they have been converted from an inputted inhibition conditions to detection parameters". However, the Examiner does not allege, nor does *Okubo* teach that there is a converter which converts the output inhibition conditions to detection parameters according to output characteristics of the image output device. It is also significant that Okubo does not teach that the accuracy of the detection parameters is changed based on a particular output device.

The Examiner relies upon *Sekizawa* for teaching that the accuracy of the detection parameters is changed based on a particular output device. However, *Sekizawa* merely teaches a system having a plurality of printers connected thereto wherein each of the printers has an ID number. Furthermore, there is no teaching in *Sekizawa* that the printer ID is used to control inhibit parameters. And, there is no teaching in *Okubo* that the ID referred to in the description of embodiment 2 relates

to a printer ID. In sum, there is no teaching in either reference, either singly or in combination, that a printer ID could be used to control the detection parameters of inhibition conditions. Thus, the rejection is based solely on hindsight using the teachings of the present application.

Accordingly, the Examiner is respectfully requested to withdraw the rejection of claim 8 and claims 9 and 10, which depend therefrom.

Claims 9, 10, and 12 depend from claim 8, and are thus also patentable at least for the reasons set forth above with respect to claim 8.

Claim 13 defines an imaging processing system comprising an image processor that includes, among other elements, a converter which converts output inhibition conditions to detection parameters according to output characteristics of the image output device. As set forth above with respect to claim 8, such a converter is not taught or suggested by *Okubo* and *Sekizawa*. Accordingly, claim 13 is also patentable over *Okubo* and *Sekizawa*.

Claim 14 defines a method of processing input image data that includes, among other elements, converting the output inhibition conditions to detection parameters according to output characteristics of the image output device. And, claim 15 defines a computer-readable storage medium that includes a program that has the step of converting the output the output inhibition conditions to detection parameters according to output characteristics of the image output device. Accordingly, claims 14 and 15 are also patentable over *Okubo* and *Sekizawa*.

Claims 1-3 and 5-7 have been rejected under 35 U.S.C. §103(a) as being unpatentable over *Okubo*. In response to that rejection, claim 1 has been amended to clarify the differences between *Okubo* and Claim 1. It now defines an image

processor combination that includes, among other elements, two converters. The first converter converts the input image data to the first image data for image forming and the second converter converts the input image data to second image data in correspondence to *characteristics of the image output device*. The combination further includes a detector which detects the specified pattern in the second image data converted by the second converter, based on the output inhibition condition stored in said memory device.

In contrast to claim 1, in *Okubo*, the scanned image data goes from the scanner 101 to the pattern detection 110 through the line thinning section 1302. The line thinning section 1302 in Figure 22 does not convert the input image data to second image data in correspondence to *characteristics of the image output device*. It merely thins out lines of the data so they can form to the level of magnification selected by the system. Specifically, the thinning section 1302 of *Okubo* is concerned only with the magnification of the output image, it is not dependent on the characteristics of the output device. Accordingly, the invention of claim 1 enables a comparison to be made with the inhibition conditions in a manner that the comparison is not adversely affected by any parameters or characteristics of the output device. Thus, claim 1 is clearly patentable over *Okubo*.

Claim 3 depends from claim 1, and is thus also patentable over *Okubo*.

Claim 5 defines an image processing system combination that also includes first and second converters. As set forth above with respect to claim 1, *Okubo* does not teach a combination that includes a second converter which converts the input image data to second image data in correspondence to characteristics of the image output device.

Claim 6 defines method of processing input image data that includes, among other elements, two converting steps. The second converting step includes converting the input image data to second image data in correspondence to characteristics of the image output device.

Claim 7 defines a computer-readable storage medium that functions similarly to the method of claim 6. Accordingly, claims 6 and 7 are also patentable over the applied prior art at least for the reasons set forth above with respect to claim 1.

Claim 4 has been rejected under 35 U.S.C. §103(a) as being unpatentable over *Okubo* as applied to claim 1 and further in view of U.S. Patent No. 6,047,085, hereinafter *Sato*. The Examiner relies upon *Sato* for the teaching of a converter comprising a conversion table based on measurement values of color of the print. However, the portions relied upon by the Examiner in *Sato* do not overcome the deficiency of the rejection based on *Okubo*. Accordingly, claim 4 is also patentable over the applied prior art. Claim 11 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Okubo* as applied to claim 8, and further in view of *Sato*. However, claim 11 is patentable over the applied prior art at least for the reasons set forth above with respect to claims 4 and 8.

In view of the foregoing amendments and remarks, the Examiner is respectfully requested to reconsider the outstanding rejections of the application.

In the event that there are any questions concerning this amendment, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

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